

UNITE HERE Fund Administrators An Affiliate of Amalgamated Life

UNITE HERE Fund Administrators, Inc.

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June 12, 2008

 5/13/08
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 Honorable Michael H. Dolinger
 United States District Court
 Southern District of New York
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

 Re: Trustees of the UNITE HERE National Health Fund, et al.
 - v. - Bag Specialist, Inc. - 07 Civ. 6188 (RMB)

Dear Judge Dolinger:

We represent the plaintiffs in the above-referenced action to collect delinquent contributions pursuant to Section 515 of ERISA. We are writing to request an extension of the June 13, 2008 deadline for submission of an additional declaration in support of plaintiffs' application for damages. We make this request for the following reasons.

On June 1, 2008 the Court issued its Order directing plaintiffs to submit a declaration by an individual with personal knowledge explaining in detail the method of calculating damages, interest, liquidated damages and costs in this action. On June 6, 2008, the Court issued its Order directing submission of the declaration by June 13, 2008. The individuals on our staff with personal knowledge of how these amounts are calculated are an auditor and his supervisor. As we previously advised the Court, the auditor responsible for the calculations of the contributions due from defendant became ill earlier this year and is absent on disability leave. While the supervisor auditor has personal knowledge of the data underlying the calculations, he will require additional time to review and analyze those calculations. Thereafter, plaintiffs' counsel will need to work with the audit supervisor in drafting a declaration in the proper format for submission to the Court.

Given the foregoing, plaintiffs respectfully request the Court's permission for an extension of time to June 26, 2008 for submission of an additional declaration in support of plaintiffs' application for damages.

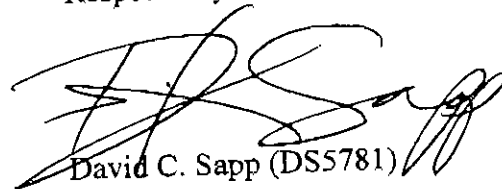
PROPOSED ORDER

The deadline for supplemental submission is extended to June 26, 2008. No further delays should be expected.
 M. J. [Signature]
 6/12/08

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The Court's considerations are appreciated.

Respectfully submitted,



David C. Sapp (DS5781)

cc: Bag Specialist, Inc.